

## **EXHIBIT 1**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----  
4 THE SATANIC TEMPLE, INC., )  
5 Plaintiff, ) **COPY**  
6 vs. ) NO. 1:22-CV-01343-MKV  
7 NEWSWEEK DIGITAL, LLC, )  
8 Defendant. )  
9 -----

10 Videotaped Deposition Upon Oral Examination  
11 of  
12 NATHAN SULLIVAN  
13 -----

14 Friday, November 17, 2023  
15 11:41 a.m.  
16 7900 Southeast 28th Street  
17 Mercer Island, Washington  
18  
19  
20  
21  
22

23 Cheryl Macdonald, CRR, RMR  
24 Court Reporter  
25 License No. 2498

1           A.     To my recollection, he is the one that  
2     quote is attributed to.

3           Q.     Okay. And to put a finer point on it, Jinx  
4     Strange is a pseudonym; correct?

5           A.     As far as I'm aware, yes.

6           Q.     Did you personally put Julia Duin in touch  
7     with Jinx Strange?

8           A.     Yes.

9           Q.     Okay. Was that done in writing or was that  
10    done orally?

11          A.     To my recollection, it was done in writing.

12          Q.     Okay. How was this writing transmitted?

13          A.     To my recollection, over -- a direct  
14    message over Twitter, now X.

15          Q.     Was this message conveyed through the  
16    QueerSatanic Twitter handle?

17          A.     I believe so.

18          Q.     And to be clear, it was not transmitted  
19    through a personal Twitter handle of yours; correct?

20          A.     Correct.

21          Q.     The statement at issue asserts covered up  
22    sexual abuse. How would you define sexual abuse?

23                   MS. TESORIERO: Objection to form.

24          Q.     Unless told otherwise, please answer the  
25    question.

1           A.       I would probably delineate between sexual  
2 harassment and sexual abuse in terms of, I guess,  
3 levels of coercion, physicality involved. Harassment  
4 might be just, like, speech or prolonged unwanted  
5 personal attention or gift giving or, like, requests.  
6 Abuse might involve, like, actual, like, physical  
7 interactions, or it might like -- it might also  
8 involve -- it might also possibly involve harassment,  
9 but in context of the presence of a power differential  
10 as established within, like, the hierarchy of The  
11 Satanic Temple chapter system or congregation.

12           **Q.       Did I understand your testimony to**  
13 **delineate meaning sexual abuse categorically excludes**  
14 **sexual harassment?**

15                   MS. TESORIERO: Objection to form.

16           A.       My understanding would be that there is --  
17 my understanding would be that there can be mutually  
18 exclusive types of either one, but that there is  
19 enough room -- but that there is room for overlap  
20 given certain -- given the unique facts or  
21 circumstances of the particular allegations.

22           **Q.       Okay. And how about cover-up? How would**  
23 **you define a cover-up within the context of this**  
24 **statement?**

25                   MS. TESORIERO: Objection to form.